

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

<b>In re:</b>	)	<b>Chapter 11</b>
	)	
<b>FIELDWOOD ENERGY LLC, et al.,</b>	)	<b>Case No. 20-33948 (MI)</b>
	)	
<b>Debtors.<sup>1</sup></b>	)	<b>(Jointly Administered)</b>
	)	

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**LOUISIANA SAFETY SYSTEMS, INC.'S (A) JOINDER AND RESERVATION  
OF RIGHTS REGARDING BEDROCK PETROLEUM CONSULTANTS, LLC'S  
RESERVATION OF RIGHTS AND LIMITED OBJECTION TO DIP  
FINANCING AND CASH COLLATERAL MOTION, AND (B) PARTIAL  
JOINDER REGARDING AMENDED AND RESTATED RESPONSE TO DIP  
FINANCING AND CASH COLLATERAL MOTION  
(Related to Docket Nos. 22, 192 and 212)**

Louisiana Safety Systems, Inc. ("LSS"), a creditor and party in interest, files this

(a) joinder and reservation of rights with respect to the limited objection ("Bedrock Objection") filed by Bedrock Petroleum Consultants, LLC's ("Bedrock") to the *Emergency Motion of Debtors for Interim and Final Orders (I) Authorizing Debtors (A) to Obtain Postpetition Financing Pursuant to 11 U.S.C. §§ 105, 361, 362, 363(b), 364(c)(1), 364(c)(2), 364(c)(3), 364(d)(1) and 364(e) and (B) to Utilize Cash Collateral Pursuant to 11 U.S.C. § 363, (II) Granting Adequate Protection to Prepetition Secured Parties Pursuant to 11 U.S.C. §§ 361, 362, 363, 364 and 507(b) and (III) Scheduling Final Hearing* (Docket No. 22) ("DIP Motion"), and (b) partial joinder with respect to the amended and restated response ("CETCO")).

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<sup>1</sup> The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, as applicable, are: Dynamic Offshore Resources NS, LLC (0158); Fieldwood Energy LLC (6778); Fieldwood Energy Inc. (4991); Fieldwood Energy Offshore LLC (4494); Fieldwood Onshore LLC (3489); Fieldwood SD Offshore LLC (8786); Fieldwood Offshore LLC (2930); FW GOM Pipeline, Inc. (8440); GOM Shelf LLC (8107); Bandon Oil and Gas GP, LLC (9172); Bandon Oil and Gas, LP (9266); Fieldwood Energy SP LLC (1971); Galveston Bay Pipeline LLC (5703); and Galveston Bay Processing LLC (0422). The Debtors' primary mailing address is 2000 W. Sam Houston Parkway S., Suite 1200, Houston, TX 77042.

**Response**") filed by Cetco Energy Services Company, LLC ("CETCO") to the DIP Motion, and in support thereof would show the Court the following:

1. As of August 17, 2020, LSS possesses claims against the Debtors for \$777,294.42 for goods and services primarily provided prior to the Petition Date, including, but not limited to, goods provided within the 20 days prior to the filing.
2. With respect to all or part of such claims, LSS has perfected and/or is entitled to perfect mineral liens and/or other statutory liens against interests in property of the Debtors. LSS reserves its right to preserve such liens as provided for under the Bankruptcy Code, including sections 362 and 546.
3. LSS joins in the Bedrock Objection (Docket No. 192) to the DIP Motion (Docket No. 22) as if fully set forth verbatim herein to the extent that such objection relates to the interests of LSS. In addition, LSS requests that it be listed in the proposed language.
4. LSS also partially joins in the CETCO Response (Docket 212) to the DIP Motion (Docket No. 22) with respect to the concerns raised by CETCO regarding any conflict between the relation back of Louisiana privileges, as provided for under Louisiana law and the Bankruptcy Code, and the proposed order filed in connection with the DIP Motion.
5. LSS reserves the right to object to entry of the Final DIP Order, including the right to raise such other and further objections (or join in other objections) prior to the hearing to consider the DIP Motion on a final basis.
6. LSS reserves all rights with respect to these bankruptcy cases, including, but not limited to, all rights under any applicable contracts or other agreements, and all rights with respect to any claims that it may assert to administrative priority.

WHEREFORE, LSS respectfully requests that this Court sustain the limited objection and grant such other and further relief as may be just and proper.

Dated: August 23, 2020

Respectfully submitted,

/s/ Sylvia Mayer  
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*Counsel for Louisiana Safety Systems, Inc.*

**CERTIFICATE OF SERVICE**

I hereby certify that on August 23, 2020, I caused a copy of the forgoing document to be served via CM/ECF upon Debtors' counsel and those parties registered to receive such electronic notifications at the time of filing.

/s/ Sylvia Mayer

Sylvia Mayer